

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**GREGORY LEE MCCONNELL** : **VIOLATIONS:**  
: **18 U.S.C. § 924(a)(1)(A)**  
: **(making false statements to a federal**  
: **firearms licensee - 3 counts)**

**INDICTMENT**

**COUNTS ONE THROUGH THREE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Kayton Manufacturing Company, doing business as A&N Outfitters, 950 Woodland Road, Wyomissing, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
2. WRM Associates, doing business as Gun Traders, 3326 C Plaza Drive, Reading, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
3. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
4. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearms Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473

are true and correct. The Form 4473 contains language warning that “making of a false oral or written statement or the exhibiting of any false or misrepresented identification with respect to this transaction is a crime punishable as a felony.”

5. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including an acknowledgment by the buyer that he/she is the actual buyer and is not acquiring the firearm on behalf of another person.

6. On or about the dates listed in the chart below, in the Eastern District of Pennsylvania, defendant

**GREGORY LEE McCONNELL,**

in connection with the acquisition of each of the firearms listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder’s records, in that defendant GREGORY McCONNELL certified on the Form 4473 that he was the actual buyer and was not acquiring the firearms on behalf of another person, when in fact, as defendant knew, this statement was false and fictitious.

<b>Count</b>	<b>Date</b>	<b>FFL</b>	<b>Firearm</b>	<b>Serial Number</b>
1	December 5, 2003	A&N Outfitters	Ruger Model P-94 9mm pistol	30862491
2	December 15, 2003	A&N Outfitters	Taurus .45 caliber pistol	NWD59385
3	December 31, 2003	Gun Traders	AMT .380 caliber pistol Basque .22 caliber pistol Smith and Wesson 9mm pistol	G12382 85449 TCZ3603

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**A TRUE BILL:**

---

**FOREPERSON**

---

**PATRICK L. MEEHAN**  
**United States Attorney**